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BROWNSTEIN HYATT FARBER SCHRECK
100 City Parkway, Suite 1600
Las Vegas, Nevada 89106
(702) 382-2101

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TRUSTEES OF THE CONSTRUCTION
INDUSTRY AND LABORERS
HEALTH AND WELFARE TRUST;
TRUSTEES OF THE CONSTRUCTION
INDUSTRY AND LABORERS JOINT
PENSION TRUST; TRUSTEES OF THE
CONSTRUCTION INDUSTRY AND
LABORERS VACATION TRUST; AND
TRUSTEES OF THE SOUTHERN
NEVADA LABORERS LOCAL 872
TRAINING TRUST,

Plaintiffs,

vs.

PROJECT DEVELOPMENT GROUP,
INC., a Pennsylvania corporation, and
GREAT AMERICAN INSURANCE,

Defendants.

CASE NO. 2:08-cv-00448-LRH-PAL

STIPULATION AND ORDER FOR EXTENSION OF TIME FOR PLAINTIFFS TO FILE OPPOSITION TO MOTION TO DISMISS

[First Request]

Plaintiffs, Trustees of the Construction Industry and Laborers Health and Welfare Trust; Trustees of the Construction Industry and Laborers Joint Pension Trust; Trustees of the Construction Industry and Laborers Vacation Trust; and Trustees of the Southern Nevada Laborers Local 872 Training Trust (collectively referred to as "Laborers Joint

1 Trust Funds") and Defendant, Project Development Group, Inc., a Pennsylvania
2 corporation ("Project Development") by and through their counsel hereby stipulate and
3 agree to the following:

4 WHEREAS, the due date for Laborers Joint Trust Funds to file their opposition to
5 Defendants' Motion to Dismiss is currently May 19, 2008;

6 WHEREAS, the Laborers Joint Trust Funds' counsel needs additional time to
7 prepare the Laborers Joint Trust Funds' opposition due to personal and professional
8 commitments;

9 NOW, THEREFORE, the parties stipulate and request an order giving the Laborers
10 Joint Trust Funds an additional eight (8) days in which to file their opposition to Project
11 Development's Motion to Dismiss. This extension is not sought for an improper purpose
12 or to delay.

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(702) 382-2101

1 Accordingly, the Laborers Joint Trust Funds shall have up and through May 27,
2 2008, in which to file their opposition to Project Development's Motion to Dismiss.

3
4 DATED this 19th day of May, 2008.

5 BROWNSTEIN HYATT FARBER
6 SCHRECK, LLP

DATED this 19th day of May, 2008.

COHEN & GRIGSBY, P.C.

7 /s/ Michael V. Infuso
8 Andrew S. Brignone, Esq.
9 Nevada Bar No. 751
10 Michael V. Infuso, Esq.
11 Nevada Bar No. 7388
12 100 City Parkway, Suite 1600
13 Las Vegas, Nevada 89106
14 Telephone: (702) 382-2101
15 Facsimile: (702) 382-8135
16
17 Attorneys for Plaintiffs

/s/ Nancy L. Heilman
Nancy L. Heilman, Esq.
Pennsylvania Bar No. 51121
11 Stanwix Street, 15th Floor
Pittsburg, PA 15222-1319
Telephone: (412) 297-4900
Facsimile: (412) 209-0672

18 Attorneys for Project Development Group

19
20 **IT IS SO ORDERED.**

21 **ORDER**



22
23 LARRY R. HICKS
24 UNITED STATES DISTRICT JUDGE

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26 DATED: May 20, 2008
27 Case No. 2:08-cv-00448-LRH-PAL